

March 14, 2022

By ECF

Honorable Paul A. Crotty
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Chambers 1350
New York, New York 10007

Re: *L.V.M. v. Lloyd, et al.*, 18 Civ. 01453 (PAC)

Dear Judge Crotty:

Counsel for the petitioners and the government respondents in the above-referenced matter respectfully submit this joint report regarding the status of settlement negotiations. *See* ECF No. 141.

Since the last status update to the Court, the government provided a counterproposal to petitioners in response to their settlement proposal, and petitioners expect to provide the government with a response later this week. Accordingly, the parties require additional time to continue their discussions in order to determine whether a consensual resolution can be reached in this case.

The parties respectfully request an additional sixty days to continue discussions in an effort to resolve this matter without additional litigation and to provide the Court with a further status update by May 13, 2022.

We thank the Court for its consideration of this submission and request.

Respectfully submitted,

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3/15/2022

SO ORDERED.

